Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	GN Docket No. 25-133
In Re: Delete, Delete, Delete	)	
	)	

COMMENTS OF PIPER NETWORKS, INC.

Piper Networks, Inc. ("Piper") respectfully submits these comments in response to the Federal Communications Commission's ("Commission") Public Notice seeking comments on deregulatory initiatives that would promote regulatory efficiency and decrease burdens on business.[1] Piper is a San Diego-based company specializing in the development and deployment of proximity solutions using ultra-wide band ("UWB") technologies for transit and airport authorities, warehouses and manufacturing facilities, smart cities, healthcare, and other enterprises that rely on real-time location awareness and data capture. Piper encourages the Commission to utilize this opportunity to update the Part 15 rules to address significant barriers, constraints, and overall inefficiencies in the way UWB networks and devices are currently authorized and permitted to be deployed.

In 2002, the Commission correctly determined that under "appropriate technical standards, UWB devices can operate using spectrum occupied by existing radio services without causing interference, thereby permitting scarce spectrum resources to be used more efficiently."[2] As a result, the Commission amended the Part 15 rules to permit the marketing and operation of certain

[1] *See In Re: Delete, Delete, Delete*, Public Notice, GN Docket No. 25-133, 1 (rel. March 12, 2025) ("Public Notice").

[2] *See Revision of Part 15 of the Commission's Rules Regarding Ultra-Wideband Transmission Systems*, First Report and Order, ET Docket No. 98-153, 17 FCC Rcd 7435, ¶ 1 (2002) ("First R&O").

types of new UWB devices. By its own admission, the rules adopted reflected a decision to "proceed[] cautiously in authorizing UWB technology" and that the standards were likely "overprotective and could unnecessarily constrain the development of UWB devices."[3]

The Commission's words were both accurate and prophetic. In the intervening decades, network operators and device manufacturers have repeatedly been required to apply to the Commission for waivers of these overly conservative UWB rules for a variety of reasons—including, but not limited to: mounting fixed terminals, outdoor use, and raising the power limits—in order to test and deploy innovative UWB technologies for the benefit of the American public.[4] These waivers have been routinely granted, with the Commission agreeing that the waivers do not undermine the purpose of the rules, authorization will not increase the risk of harmful interference, and grant would serve the public interest.[5] Significantly, despite the initial level of contention in the docket establishing the UWB rules,[6] opposition to recent waiver requests has been relatively sparse.[7]

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[3] *Id*.

[4] *See*, *e.g.*, *Kontur, AS Request for Waiver of Sections 15.503(d), 15.31(c), and 15.521(d) of the Commission's Rules*, Order, ET Docket No. 24-209, DA-25-58 (OET 2025); *GPR, Inc. Request for Waiver of the Commission's Part 15 Rules Applicable to Ultra-Wideband Devices*, Order, ET Docket No. 19-241, 38 FCC Rcd 10376 (OET 2023); *Assa Abloy Group For Waiver of 15.519(a), and 15.519(a)(2) of the Commission's Rules Applicable to Ultra- Wideband Devices*, Order, ET Docket No. 21-267, 37 FCC Rcd 12311 (OET 2022); *Piper Networks Inc. Request for Waiver of Section 15.519(a) and Section 15.519(a)(2) of the Commission's Rules*, Order, ET Docket No. 19-246, 35 FCC Rcd 12912, (OET 2020); *Metrom Rail, LLC's Request for Waiver of Section 15.519(a) and 15.519(c) of the Commission's Rules*, Order, ET Docket No. 18-284, 35 FCC Rcd 11347 (OET 2020); *iRobot Corporation Request for Waiver of Section 15.250 of the Commission's Rules*, Order, ET Docket No 15-30, 30 FCC Rcd 8377 (OET 2015).

[5] *See generally* n.4.

[6] *See* First R&O, ¶ 2.

[7] *See generally* ET Docket Nos. 24-209, 21-267, 19-246, 19-241, 18-284, & 15-30.

But rules that are so overly conservative they require regular petitions for waiver to be used are inefficient and costly to administer. Decades of experience administering and applying the UWB rules demonstrate a constant strain on Commission resources and a need for reassessment. Review of the UWB rules could help streamline the application process, lead to more certain and consistent outcomes and timelines for regulatees, and free up much needed staff time for other projects. Importantly, increased regulatory certainty would enable network operators and device manufacturers to focus on the development, deployment, and expansion of UWB-enabled technologies throughout the United States without having to worry that waivers cannot be obtained for innovative devices.

Piper supports the Commission's efforts to alleviate unnecessarily regulatory burdens to facilitate investment in innovative and advanced capabilities. To that end, Piper strongly encourages the Commission to initiate a proceeding to modernize its UWB rules, thereby providing regulatory certainty and consistency to all Part 15 regulatees.

Respectfully Submitted,

/s/ Robert Hanczor
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Piper Networks, Inc.

April 11, 2025